

# **West Jefferson County Community Task Force**



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## Comments to the STAR Program

These comments are submitted on behalf of the Board of the West Jefferson County Community Task Force in support of the Program and urge that it be adopted as soon as possible. We however look forward to an annual review and update of the STAR program to monitor results.

Current regulations require all facilities to submit plans for achieving Reasonably Available Control Technology or Maximum Achievable Control Technology. In principle, plants are free to select the most appropriate emissions monitoring system for their particular emissions. The choice is subject to review by the APCD, which reserves the right to determine the most appropriate emissions monitoring technique for each source. The Task Force would like for the options to be discussed publicly with emphasizes on any changes, deemed necessary by APCD.

On the subject of variances, it is the desire of the Task Force that the definition of “goals” and “standards” find no conflict in application. The ultimate reason for the program is the protection of public health.

We are submitting a copy of the 1996 Action Agenda as we use this as a guidance.

Sincerely,

Arnita Gadson

**WEST JEFFERSON COUNTY COMMUNITY TASK FORCE  
HEALTH AND ENVIRONMENTAL CONCERNS**

**ACTION AGENDA**

**Presented to Elected Officials September 3, 1996**

**Air Quality:**

- ⇒ 1. Odors in Area:
  - a) Odors from chemical factories – Rubbertown
  - b) Odors from industrial facilities (MSD, sewage haulers, tobacco & liquor manufacturers)
- 2. High level of ozone in the air
- 3. Ozone-depleting chemicals
- ⇒ 4. Particulate air pollution – all types
  - a) Particulate pollution from Gallagher plant in Indiana/blowdowns
  - b) Yellow dust on Shawnee Drive
  - c) Sulfur dioxide blowdowns from power plants
- 5. Synergistic effects of all emission sources in the community (industry, auto, utilities, etc.)
- 6. Trucks that dump septic waste into MSD system
- 7. Tank and trailer washing facilities in the area are a source of odors and pollution
- 8. Pollution from vehicles (automobiles, city buses, MSD trucks, other haulers)

**Water Quality**

- 9. The pumping of pollutants into the Ohio River
- 10. Raw sewage in the waterways
- 11. Drainage system cannot handle runoff
- 12. Historical aspects of ground water contamination
- 13. Chickasaw Lake – cleaning, restocking, placing back into use
- ⇒ 14. Rubbertown industries should explore “zero discharge” for water

**Land Quality**

- 15. Legal and illegal dump sites
- 16. Spill sites and large quantities of chemicals remaining in the ground
- 17. Abandoned industrial and commercial sites
- 18. Potential hazards in transportation of chemicals (by rail, trucks, barge, etc.) and hazardous substances that may leak into the ground/water when parked
- 19. Fire risks from houses built too close together, over-development
- 20. Trailer parks without sewers

⇒Indicates this in one of the top 5 priority items

- 21. Rezoning for objectionable land uses is too easy
- 22. Abandoned septic tanks remain in the ground near the Ohio River (west of SW Parkway)

### **Miscellaneous**

- 23. Industries in area need to be better neighbors – receptive to community concerns
- ⇒ 24. The community has a “right-to-know” the condition of the air, land, and water, and the presence and combined effects of:
  - a) Toxic releases reported by local industries/ health effects/ compare with allowable levels
  - b) Identify pollution that companies are routinely emitting / include rail cars (concern about possible explosions)
  - c) There is a need for a central repository of information, for topics such as air, water, and land pollution, emissions of air toxics, the health effects of pollution, and hazardous material transportation
- 25. Local/state/federal regulatory standards are not sufficient, they need to be changed.
- 26. Household pollutant sources – community awareness of impact of own activities
- 27. Need for Health assessment of area residents, including information on respiratory and neurological problems and developmental disabilities
- 28. Redefine presumption about pollution control and the goals of pollution control, particularly concerned that the Commonwealth of Kentucky makes the federal floor our ceiling
- 29. Standards must be applied fairly county-wide
- 30. How to get answers to questions about what is going on in the neighborhood
- 31. Education of residents about environmental concerns and problems
- 32. The role individual lifestyle choices such as smoking, diet and alcohol, play in community health
- ⇒ 33. Health care – access, quality and affordability
- 34. Concerns of cancer in the area
- 35. Lead poisoning
- 36. Broaden area of concern to include other downtown residential neighborhoods affected by industrial pollution, including the California neighborhood
- 37. The need for a single point of contact similar to CityCall, which could coordinate countywide government investigation and response to environmental health and community safety concerns.

### **TASK FORCE RECOMMENDATIONS**

- 1. The Task Force should remain together as a functioning body.
- 2. A ZERO discharge air study and pollution elimination plan should be undertaken and funded by each of the Rubbertown companies.
- 3. A comprehensive survey of all known and suspected dump and spill sites in the Rubbertown area should be initiated immediately.

4. Concerns about past contamination of soil and water.  
Develop a more comprehensive picture of nature and the extent of land and water Contamination of the West Jefferson County area:
  - a) Conduct a comprehensive site inventory and sampling for the West Jefferson County, involving former workers, community residents, existing databases, past land uses and aerial photographs, as well as other information, to identify areas of concern for investigation. Expand the Brownfields survey of sites where contamination may be located.
  - b) Utilize state and local government resources to encourage and require responsible parties to conduct investigation and remediate contamination.
5. Concerns regarding environmental health, including cancer and other illnesses
  - a) Develop with community involvement a comprehensive environmental health survey, using two pilot neighborhoods. (Suggested neighborhoods - Chickasaw and Lake Dreamland)
  - b) Maintain an ongoing health assessment capability including free blood screening for lead and other environmental toxins where exposure is suspected, including hormone mimicking chemicals. Consider both single point of contact sites and mobile units.
6. Concerns regarding lack of emissions and release information and lack of toxicity information on chemical and compounds released into air, land and water
  - a) Require continuous emissions monitoring for all major facilities emitting toxic air pollutants, like that done in Ashland and Calvert City.
  - b) Develop central repository for public access to toxic release data, air toxics releases, and toxicological information.
  - c) Develop free workshops on environmental permitting and enforcement beginning with workshops on Title V of the Clean Air Act Amendments and public participation.
  - d) Develop pollution prevention strategy identifying chemicals of greatest concern due to toxicity and impact on quality of life, develop negotiated and enforceable "good neighbor" agreements to reduce air pollution through independent environmental audits, and exploration of pollution prevention methods. Industry should seek alternate processes to replace the use of carcinogenic and chlorinated compounds.
  - e) Require Jefferson County Air Pollution Control District to initiate formal communication with the Indiana Department of Environmental Management and Public Service Indiana to investigate the composition and toxicity of emissions from the Gallagher PSI plant and to develop strategies for reducing emission from that facility.
  - f) Develop and fund an air monitoring network capable of detecting and analyzing ambient air quality for air toxics. Consider mobile units as well.
7. Evaluate regulatory process for assuring the testing and safety of railcars, tractor trailers, tanks and barges that carry hazardous chemicals.

8. Explore grant possibilities / Solicit funds from local industries for regular health screening to be offered to residents of affected communities.
9. Explore innovative opportunities for allocating funds for improving education opportunities for area youth:  
Examples:
  - a. Assess filing fees from facilities in Jefferson County that file annual toxic release inventory reports.
  - b. Divert funds from pollution penalties.
10. Create a “watchdog” committee or agency to check on complaints of retribution against workers who seek preventive health care for possible exposures. Companies should be encouraged to screen employees, not punish them.
11. Need to develop alternate interstate routes for transporting chemicals and hazardous waste.
12. Bring air quality up by natural means, i.e., plant trees, create buffer zones.
13. Investigate to determine if contamination still exists in the ground at Ashland refinery.
14. Implement a better monitoring system for what goes into sewers and groundwater.
15. Consider conducting a comparative risk assessment to assure that highest risk impacts are identified and addressed.